Fidel Cassino-DuCloux **Assistant Federal Public Defender** 101 S.W. Main Street, Suite 1700 Portland, Oregon 97204 (503) 326-2123 Telephone (503) 326-5524 Facsimile Fidel Cassino-DuCloux@fd.org

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 3:22-cr-00144-IM

Plaintiff,

v.

MARIO CAMARENA-ZAMORA,

DECLARATION OF COUNSEL IN SUPPORT OF UNOPPOSED MOTION TO CONTINUE TRIAL DATE

Defendant.

- I, Fidel Cassino-DuCloux, declare:
- 1. I am counsel of record in this matter for the defendant, Mario Camarena-Zamora.
- 2. A continuance of the current trial date of April 11, 2023, to a date at least 90 days from the present setting is necessary as more time is required to continue discovery review, identify necessary research and investigation tasks to be conducted, consult with and effectively advise Mr. Camarena-Zamora, and adequately prepare the case.

- 3. I have spoken with the defendant and explained the reasons for requesting a continuance and his rights under the Speedy Trial Act. Mr. Camarena-Zamora agrees with the reasons for the continuance and waives his rights to a speedy trial.
- 4. Assistant United States Attorney Thomas Steven Ratcliffe has been contacted and does not object to this continuance.
- 5. This declaration is made in good faith and in support of the motion for continuance of the trial date in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on April 7, 2023, in Portland, Oregon.

/s/ Fidel Cassino-DuCloux

Fidel Cassino-DuCloux Assistant Federal Public Defender